

FORM NLRB-501  
(3-21)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case

32-CA-285619

Date Filed

11-02-2021

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer  Apple, Inc.		b. Tel. No. 408-996-1010
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code)  1 Apple Park Way Cupertino, CA 95014	e. Employer Representative  (b) (6), (b) (7)(C)	g. e-mail
		h. Number of workers employed 160,000
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology equipment	j. Identify principal product or service Technology equipment and services	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Please see attached Statement of Charge

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Laurie M. Burgess, attorney, on behalf of individual

4a. Address (Street and number, city, state, and ZIP code)  498 Utah Street San Francisco CA 94110	4b. Tel. No. 312-320-1718
	4c. Cell No.
	4d. Fax No.
	4e. e-mail lburgess@burgess-laborlaw.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)  
N/A

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

Laurie M. Burgess, attorney

Tel. No.  
312-320-1718

Office, if any, Cell No.

Fax No.

e-mail  
lburgess@burgess-laborlaw.com

Address 498 Utah Street San Francisco CA 94110

Date Nov. 2, 2021

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

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On (b) (6), (b) (7)(C), Apple Inc. employee (b) (6), (b) (7)(C) was terminated from employment for "daring to disturb" Apple's "universe." Specifically, (b) (6), (b) (7)(C) spoke up regarding (b) (6), (b) (7)(C) personal experiences regarding workplace concerns and helped give voice to (b) (6), (b) (7)(C) co-workers' concerns in a workplace where such issues have been systemically siloed, suppressed, and unaddressed. (b) (6), (b) (7)(C) actions on (b) (6), (b) (7)(C) own behalf and that of (b) (6), (b) (7)(C) coworkers – all core concerted protected activity under Section 7 of the NLRA – include, but are not limited to the following:

- raising concerns with (b) (6), (b) (7)(C) employer regarding how (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) coworkers, were belittled, yelled at and treated in an abusive manner;
- raising concerns regarding Apple's abusive and discriminatory treatment of people with disabilities including the failure to appropriately accommodate persons with disabilities;
- raising concerns regarding pay equity at Apple;
- raising concerns regarding pervasive sexism, racism, bullying and homophobic behavior at Apple;
- raising concerns regarding employee mental health issues including employee suicide;
- raising concerns regarding Apple's failure to properly address safety concerns regarding COVID exposure;
- raising concerns regarding and advocating in support of employees who were disparately and adversely impacted by Apple Inc.'s "remote work" policies;
- challenging Apple Inc.'s decisions to hire individuals in leadership roles who made public, overtly racist and sexist statements.
- advocating for health insurance benefits including securing safe abortion procedures;
- establishing a mechanism for fellow employees to air their concerns, validate their experiences, provide links to support resources including the NLRB and EEOC and otherwise lend aid and support to Apple employees adversely impacted by Apple's policies and application of its policies toward them.
- collecting data voluntarily offered by employees to demonstrate the pervasiveness of workplace issues including, but not limited to those identified above;

Apple Inc. terminated (b) (6), (b) (7)(C) employment based upon false and pretextual reasons and in fact terminated (b) (6), (b) (7)(C) employment in attempt to nip-in-the-bud the

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successful organizing campaign that (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) coworkers established to address and redress employees' workplace concerns.

Apple Inc. has also discriminatorily applied its policies including, but not limited to, limiting employees' use of its survey tools to prevent them from collecting data in support of their workplace concerns.

Apple, through its agents, including but not limited to (b) (6), (b) (7)(C) has unlawfully threatened employees for engaging in mutual aid and protection including discussing among themselves and/or publicly, issues of core workplace concern.